

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In Re: Tina Cantwell-Brooke

Case No. 18-35289 KLP
Chapter 13

**NOTICE OF OBJECTION TO DEBTOR'S CHAPTER 13 PLAN AND HEARING
THEREON**

Real Property at 3104 Taylor Avenue, West Point, Virginia 23181

J.G. Wentworth Home Lending, LLC. (Cenlar FSB, servicer) herein, has filed papers with the court objecting to debtor's chapter 13 plan. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

The hearing is scheduled for **January 2, 2019 at 09:10 a.m.** at Judge Phillips' Courtroom, 701 East Broad Street, Rm. 5100, Richmond, Virginia 23219.

/s/ Dinh Ngo, Esq.
Dinh Ngo, Esq.
Attorney for Secured Creditor
Bar No. 85661
McCabe, Weisberg & Conway, LLC
312 Marshall Avenue, Suite 800
Laurel, MD 20707
301-490-1196
bankruptcyva@mwc-law.com

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of December, 2018 I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing pleading will be served electronically by the Court's CM/ECF system on the following:

Carl M. Bates
P.O. Box 1819
Richmond, Virginia 23218

Matthew Samuel Throop
Throop Law, P.C.
530 East Main Street, Ste. 1020
Richmond, Virginia 23219

I hereby further certify that on the 18th day of December, 2018, a copy of the foregoing pleading was also mailed first class mail, postage prepaid to:

Tina Cantwell-Brooke
2410 Landing Rd
Providence Forge, Virginia 23140
(Via U.S Mail)

/s/ Dinh Ngo, Esq.
Dinh Ngo, Esq.

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OBJECTION BY SECURED CREDITOR TO PROPOSED PLAN

Comes now the secured creditor, J.G. Wentworth Home Lending, LLC. (Cenlar FSB, servicer), which holds a Deed of Trust secured by the Debtor's real property at 3104 Taylor Avenue, West Point, Virginia 23181, by and through its attorney, Dinh Ngo, Esq., and objects to the proposed plan and to confirmation and for reason therefore states as follows:

1. The Debtor has proposed a plan which includes no provision for payment of arrearages owed to J.G. Wentworth Home Lending, LLC. (Cenlar FSB, servicer).

2. The secured creditor J.G. Wentworth Home Lending, LLC. (Cenlar FSB, servicer) anticipates filing a Proof of Claim with pre-petition arrearages due in the approximate amount of \$948.52.

3. The plan as proposed by the Debtor would therefore be insufficient to pay the claim of J.G. Wentworth Home Lending, LLC. (Cenlar FSB, servicer).

Wherefore the Secured Creditor prays this court to enter an Order

1. Denying confirmation of the proposed Chapter 13 Plan, or alternatively
2. Modifying the Chapter 13 Plan to provide for payment in full of the Claim filed by the secured creditor, or alternatively
3. For such other and further relief as the Court deems appropriate.

Respectfully submitted:

/s/ Dinh Ngo, Esq. [dn 12/18/18]
Dinh Ngo, Esq.

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